



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**  
 Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

September 14, 2022

**SENT VIA E-MAIL & WEB PORTAL**

Amanda Maxwell  
 Executive Director and Secretary  
 Washington Utilities and Transportation Commission  
 621 Woodland Square Loop SE  
 Lacey, WA 98503

Received  
 Records Management  
 09/14/22 09:10:23  
 State Of WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

Re: *Washington Utilities and Transportation Commission v. Avista Corporation d/b/a Avista Utilities*, Dockets UE-220053, UG-220054, and UE-210854 (*Consolidated*)

Dear Director Maxwell:

Enclosed for filing in the above-referenced dockets are the Exhibits List and the proposed Cross-Examination Exhibits of Public Counsel.

Public Counsel has proposed cross-examination exhibits for the following witnesses:

- David R. Howell, Avista (one exhibit)
- Scott Kinney (two exhibits)
- Clint Kalich (one exhibit)
- Elizabeth Andrews (15 exhibits)
- Bob Brandkamp (five exhibits)
- Kelly Magalsky (four exhibits)
- Grant Forsyth (one exhibit)
- Mark Thies (five exhibits)

It should be noted that a number of the aforementioned Cross-Examination Exhibits may contain confidential information and are designated as such per Protective Order in Dockets UE-220053, UG-220054, and UE-210854 (Consolidated).

Public Counsel also intends to use WUTC Final Order 08/05 in Docket UE-200900/UG-200901 and UE-200904 (consolidated) in our cross examination of Avista witnesses, Scott J. Kinney but will not create a separate exhibit for a Commission Order. Public Counsel has included a copy of the Order in the e-mail correspondence for ease of reference.



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

Public Counsel may also refer to the workpapers of Avista witness, Clint G. Kalich, during the cross examination of Kalich, but does not intend to proffer the workpapers as a Public Counsel exhibit for the record.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ 

NINA M. SUETAKE, WSBA No. 53574

Assistant Attorney General

ANN PAISNER, WSBA No. 50202

Assistant Attorney General

Public Counsel Unit

Email: [Nina.Suetake@atg.wa.gov](mailto:Nina.Suetake@atg.wa.gov)

Email: [Ann.Pasiner@atg.wa.gov](mailto:Ann.Pasiner@atg.wa.gov)

Enclosures

cc: ALJ O'Connell and Service List (via E-mail)

**CERTIFICATE OF SERVICE**

**DOCKETS UE-220053, UG-220054, and UE-210854 (Consolidated)**  
**Wash. Utils. & Transp. Comm'n. v. Avista Corp. d/b/a Avista Utils.,**

**I HEREBY CERTIFY** that I have this day served *Public Counsel Exhibit Lists and Cross-Answering Exhibits* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

<p><b>COMMISSION STAFF:</b></p> <p>Sally Brown Assistant Attorney General WUTC P.O. Box 40128 Olympia, WA 98504-0128 <a href="mailto:Sally.Brown@UTC.WA.GOV">Sally.Brown@UTC.WA.GOV</a></p> <p>Betsy DeMarco, <a href="mailto:Betsy.DeMarco@UTC.WA.GOV">Betsy.DeMarco@UTC.WA.GOV</a></p> <p>Jeanne Roth, <a href="mailto:Jeanne.Roth@UTC.WA.GOV">Jeanne.Roth@UTC.WA.GOV</a></p>	<p><b>COMMISSION STAFF:</b></p> <p>Jeff Roberson Assistant Attorney General WUTC P.O. Box 40128 Olympia, WA 98504-0128 <a href="mailto:Jeff.Roberson@UTC.WA.GOV">Jeff.Roberson@UTC.WA.GOV</a></p> <p>Jennifer Cameron-Rulkowski, <a href="mailto:Jennifer.cameron-rulkowski@UTC.WA.GOV">Jennifer.cameron-rulkowski@UTC.WA.GOV</a></p> <p>Harry Fukano, <a href="mailto:Harry.Fukano@UTC.WA.GOV">Harry.Fukano@UTC.WA.GOV</a></p> <p>Nash Callaghan, <a href="mailto:Nash.Callaghan@UTC.WA.GOV">Nash.Callaghan@UTC.WA.GOV</a></p>
<p><b>COMMISSION STAFF:</b></p> <p>Joe Dallas Assistant Attorney General, WUTC P.O. Box 40128 Olympia, WA 98504-0128 <a href="mailto:Joe.Dallas@UTC.WA.GOV">Joe.Dallas@UTC.WA.GOV</a></p> <p>Dan Teimouri, <a href="mailto:Daniel.Teimouri@UTC.WA.GOV">Daniel.Teimouri@UTC.WA.GOV</a></p>	<p><b>AVISTA UTILITIES:</b></p> <p>Patrick Ehrbar Director of Regulator Affairs Avista Corporation dba Avista Utilities P.O. Box 3727 – MSC-29 Spokane, WA 992200 <a href="mailto:Pat.Ehrbar@AVISTACORP.COM">Pat.Ehrbar@AVISTACORP.COM</a></p> <p>David J Meyer, Esq. <a href="mailto:David.Meyer@AVISTACORP.COM">David.Meyer@AVISTACORP.COM</a> <a href="mailto:AvistaDockets@AVISTACORP.COM">AvistaDockets@AVISTACORP.COM</a></p>

**ALLIANCE OF WESTERN ENERGY CONSUMERS:**

Sommer Moser  
Davision Van Cleve, PC  
1750 SW Harbor Way STE 450  
Portland, OR 97201  
[sjm@dvclaw.com](mailto:sjm@dvclaw.com)

Bradley Mullins,  
[brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)

Tyler Pepple, [tcp@dvclaw.com](mailto:tcp@dvclaw.com)

Lance Kaufman  
Boise White Paper, L.L.C.  
4801 W. Yale Ave  
Denver, CO 80219  
[lance@aegisinsight.com](mailto:lance@aegisinsight.com)

**WALMART:**

Vicki M. Baldwin  
Parsons Behle & Latimer  
201 S. Main St., Ste. 1800  
Salt Lake City, Utah 8411  
[vbaldwin@parsonsbhlehle.com](mailto:vbaldwin@parsonsbhlehle.com)

Alex Kronauer  
Sr. Manger, Energy Services  
Walmart Inc.  
2608 Southeast J. St.  
Bentonville, Arkansas 72716  
[Alex.kronauer@walmart.com](mailto:Alex.kronauer@walmart.com)

**NORTHWEST ENERGY COALITION:**

Lauren McCloy  
811 1<sup>st</sup> Ave, Ste. 305  
Seattle, WA 98104  
[Lauren@nwenergy.org](mailto:Lauren@nwenergy.org)

Amy Wheelless, [amy@nwenergy.org](mailto:amy@nwenergy.org)

Irion Sanger  
1041 SE 58<sup>th</sup> Pl.  
Portland, OR 97215  
[irion@sanger-law.com](mailto:irion@sanger-law.com)

Joni Sliger, [Joni@sanger-law.com](mailto:Joni@sanger-law.com)  
Ellie Hardwick, [ellie@sanger-law.com](mailto:ellie@sanger-law.com)

**SIERRA CLUB:**

Gloria Smith  
2101 Webster St., Ste. 1300  
Oakland, CA 94612  
[Gloria.smith@sierraclub.org](mailto:Gloria.smith@sierraclub.org)

James Van Nostrand  
120 Mountainside Court  
Oakland, MD 21550  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)

Jim Dennison  
Sierra Club  
1650 38<sup>th</sup> St. Ste. 120W  
Boulder, CO 80301  
[Jim.dennison@sierraclub.org](mailto:Jim.dennison@sierraclub.org)

**SMALL BUSINESS UTILITY  
ADVOCATES:**

Jeff Winmill  
548 Market St. Ste. 11200  
San Francisco, CA 94104  
[Jeff@utilityadvocates.org](mailto:Jeff@utilityadvocates.org)

**THE ENERGY PROJECT:**

Yochi Zakai 3406 Redwood Ave.  
Bellingham, WA 98225  
[yzakai@smwlaw.com](mailto:yzakai@smwlaw.com)  
Stacey Lee, [slee@smwlaw.com](mailto:slee@smwlaw.com)

Dated at Seattle, Washington this 14th day of September, 2022.

*/s/ Brice C. Hartman*  
BRICE C. HARTMAN  
Legal Assistant